

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*, §
§
Plaintiffs, §
§
v. § Case No. 1:18-CV-68
§
UNITED STATES OF AMERICA, *et al.*, §
§
Defendants, §
§
and §
§
KARLA PEREZ, *et al.*, §
§
Defendant-Intervenors, §
and §
§
STATE OF NEW JERSEY §
§
Defendant-Intervenor. §

**DEFENDANT-INTERVENORS' UNOPPOSED MOTION FOR LEAVE TO
EXCEED PAGE LIMITS ON THEIR BRIEF IN OPPOSITION TO MOTION FOR
SUMMARY JUDGMENT**

Defendant-Intervenors Karla Perez, et al. (“Defendant-Intervenors”) respectfully request that the Court grant permission to exceed the 20-page limit by 25 pages in their Brief in Opposition to Plaintiff’s Motion for Summary Judgment. Defendant-Intervenors request these additional pages in order to present their arguments to the Court regarding the complex and significant issues presented in Plaintiffs’ motion. Defendant-Intervenors seek this extension for good cause and in the interests of justice, not for delay, and no party will be prejudiced if the extension is granted. Plaintiffs made a request to exceed the 20-page limit by 26 pages for their brief in support of their motion for summary judgment, *see* Dkt. 355, which Defendant-

Intervenors did not oppose. Plaintiffs noted this motion “raises complex issues in a case of national importance” and that the extra pages were needed to “adequately present these issues.”

Id. The Court granted this request. *See* Dkt. 361.

The Plaintiffs, Defendants, and the State of New Jersey as Defendant-Intervenor do not oppose Defendant-Intervenors’ request.

CONCLUSION

For the foregoing reasons, Defendant-Intervenors respectfully request that the Court grant Defendant-Intervenors’ Unopposed Motion for Leave to Exceed Page Limits.

Dated: June 14, 2019

Respectfully Submitted,

**MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales
Nina Perales (Tex. Bar No. 24005046);
(SD of Tex. Bar No. 21127)
Attorney-in-Charge
Alejandra Ávila (Tex. Bar No. 24089252)
(SD of Tex. Bar No. 2677912)
Ernest I. Herrera (Tex. Bar No. 24094718);
(SD of Tex. Bar No. 2462211)
110 Broadway, Suite 300
San Antonio, Texas 78205
Phone: (210) 224-5476
Facsimile: (210) 224-5382
Email: nperales@maldef.org

Denise Hulett
Mexican American Legal Defense and
Educational Fund
1512 14th Street
Sacramento, CA 95814
Phone: (916) 444-3031
Email: dhulett@maldef.org
(Admitted pro hac vice)

ROPES & GRAY LLP
Douglas H. Hallward-Driemeier
2099 Pennsylvania Ave NW
Washington, DC 20006-6807

(202) 508-4600
(202) 508-4776 (direct dial)
Douglas.Hallward-
Driemeier@ropesgray.com
(Admitted pro hac vice)

**GARCÍA & GARCÍA,
ATTORNEYS AT LAW P.L.L.C.**
Carlos Moctezuma García
(Tex. Bar No. 24065265)
(SD of Tex. Bar No. 1081768)
P.O. Box 4545
McAllen, TX 78502
Phone: (956) 630-3889
Facsimile: (956) 630-3899
Email: cgarcia@gaciagarcialaw.com

Attorneys for Defendant-Intervenors

CERTIFICATE OF CONFERENCE

I certify that on June 12, 2019, I emailed counsel for all parties regarding the relief requested in this motion. Counsel for Plaintiffs, Defendants, and the State of New Jersey each indicated that they do not oppose this motion.

/s/ Alejandra Ávila
Alejandra Ávila

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on June 14, 2019, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Alejandra Ávila
Alejandra Ávila